

## **Exhibit N**

For ex parte application  
P: RH, 1<sup>st</sup>, 26 February 2019

HCMP 251/2019

IN THE HIGH COURT OF THE  
HONG KONG SPECIAL ADMINISTRATIVE REGION  
COURT OF FIRST INSTANCE  
MISCELLANEOUS PROCEEDINGS NO. 251 OF 2019

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IN THE MATTER OF an application for interim relief  
pursuant to Section 21M of the High Court Ordinance  
(Cap. 4)

BETWEEN

ROBERT W. SEIDEN (IN HIS CAPACITY AS  
TEMPORARY RECEIVER OF LINK MOTION INC.) 1<sup>st</sup> Plaintiff

and

LINK MOTION INC. 1<sup>st</sup> Defendant

VINCENT WENYONG SHI 2<sup>nd</sup> Defendant

JIA LIAN 3<sup>rd</sup> Defendant

XIAO YU 4<sup>th</sup> Defendant

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**AFFIDAVIT OF REBECCA HUME**

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I, Rebecca Hume, of 9 Forum Lane, Suite 3207, Camana Bay, Grand Cayman, KY1-9006,  
Cayman Islands do solemnly and sincerely swear and say as follows:-


1. I am an attorney licensed to practice in the Cayman Islands and a Partner of Messrs. Kobre & Kim (Cayman), attorneys-at-law for the Plaintiff in these proceedings (the “**Proceedings**”). I have advised the Plaintiff in respect of certain Cayman Islands law aspects of his role as Temporary Receiver of Link Motion Inc (“**Link Motion**”). I am duly authorized by the Plaintiff to make this affidavit on his behalf.
2. Unless otherwise expressly stated, the facts and matters to which I depose in this affidavit are within my own knowledge and are true, or have been derived by me in the conduct of this matter from the sources indicated below and are true to the best of my knowledge, information and belief.
3. I swear this affidavit in support of the Plaintiff’s application pursuant to section 21M of the High Court Ordinance (Cap 4) seeking the appointment of receivers over the 1<sup>st</sup> Defendant’s assets in Hong Kong (the “**Application**”).
4. The Plaintiff has informed me that his objective is to give effect to the order (the “**US Order**”) granting his appointment as Temporary Receiver of Link Motion in the United States by taking control of the bank accounts of Link Motion, which includes bank accounts in Hong Kong, as well as any Hong Kong subsidiaries of Link Motion.
5. The Plaintiff has consulted with me about the possibility of using the powers conferred upon him under the US Order to effect changes in the composition of Link Motion’s board of directors, and to then in turn take control of Link Motion’s Hong Kong bank accounts by the authority held in the capacity as a director of Link Motion.

6. I have informed the Plaintiff that, in my view, the US Order does not grant him authority that would be recognized by a Cayman Islands corporate services provider to effect changes in the Link Motion board of directors.
7. To obtain such authority, the Plaintiff will need to make an application to the courts of the Cayman Islands to be appointed as a receiver under Cayman Islands law, with similar powers to those granted under the US Order.
8. Such an application to the Cayman Islands court will involve some time (7-10 days if the Plaintiff is able to proceed *ex parte*, 4-6 weeks if he proceeds inter partes, assuming no material opposition) and expense to the Plaintiff before any receivership appointment can be made, if the Cayman Islands court is minded to grant such an order.

Sworn at Grand Cayman,  
Cayman Islands  
Dated this 26<sup>th</sup> day of February 2019

 Debora Hume

Before me,

  
**RHONDA L. ANDERSON**  
Notary Public In and for The Cayman Islands  
My Commission Expires on 1 Jan., 20 20

This Affidavit is filed on behalf of the Plaintiff

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BETWEEN

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CAPACITY AS TEMPORARY  
RECEIVER OF LINK MOTION  
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1<sup>st</sup> Plaintiff

and

LINK MOTION INC.

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VINCENT WENYONG SHI

2<sup>nd</sup> Defendant

JIA LIAN

3<sup>rd</sup> Defendant

XIAO YU

4<sup>th</sup> Defendant

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**AFFIDAVIT OF REBECCA HUME**

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Dated the 26 day of February 2019

Filed the    day of February 2019

**KOBRE & KIM**  
Solicitors for the Plaintiffs  
ICBC Tower, 6/F  
3 Garden Road, Central, Hong Kong  
Tel: 2127 3288 Fax: 2127 3280  
(Ref: RA/RTM 1381.002)